

# Exhibit A

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

GEORGE ANTHONY DEVOLDER  
SANTOS,  
Also known as "George Santos"

*Defendant.*

23-cr-197 (S-1) (JS) (AYS)

**PROPOSED JUROR  
QUESTIONNAIRE**

**TO THE PROSPECTIVE JUROR:**

The information that you give in response to the items in this questionnaire will be used only by the Court and the parties to select a qualified jury and will not be made public. After a jury has been selected, all copies of your questionnaire will be returned to the Clerk of the Court and kept in confidence, under seal. The attorneys are under orders to maintain the confidentiality of any information they learn in the course of reviewing the questionnaire.

Please answer each question as completely and accurately as you can. Your complete written answers will save a great deal of time for the Court, the parties and you. There are no right or wrong answers to the questions. In order to ensure that your answers are not influenced by the opinions of others, you should fill out the questionnaire by yourself without consulting or talking with any other individuals.

You are expected to sign your questionnaire, and your answers will have the effect of a statement given to the Court under oath. What is needed is your very best, honest effort to answer the questions contained in this questionnaire.

If you cannot answer a question because you do not understand it, write "Do not understand" in the space after the question. If you cannot answer because you do not know, write "Do not know" in the space after the question. If you need extra space to answer any question, please use the extra blank sheets of paper included at the end of the questionnaire. Be sure to indicate on the blank page the number of the question you are answering.

I am sure you understand the importance of juries to our American system of justice. I am confident that you also appreciate your duty as a citizen to serve as a juror if you are eligible. Your cooperation in completing and returning this "Juror Questionnaire" is a part of that duty. Without your help our courts cannot operate properly in accordance with the United States Constitution.

The sole purpose of the questionnaire is to encourage your full expression and honesty, so that all parties will have a meaningful opportunity to select a fair and impartial jury to try the issues in this case. Thank you for your full cooperation. It is of vital importance to the Court.

**I. Background Information**

1. Juror Number: \_\_\_\_\_ (Please write your assigned juror number on each page of this questionnaire)
2. Age: \_\_\_\_\_
3. Gender:  
 Male  Female  They/Them  Other: \_\_\_\_\_  Prefer not to say
4. Race/Ethnicity (optional):  
 White  Black/African American  Hispanic/Latino  
 Asian  Native American  Other: \_\_\_\_\_  Prefer not to say
5. Place of birth: City \_\_\_\_\_ State/Country \_\_\_\_\_
6. If not born in the United States, are you a U.S. citizen?  Yes  No
7. What languages do you speak fluently? \_\_\_\_\_
8. Marital Status:  
 Single  Married  Divorced  Widowed  Separated  Partnered
9. In what neighborhood of New York do you currently reside? (e.g., Central Islip, East Hampton, etc.) \_\_\_\_\_
10. How long have you lived at your current residence? \_\_\_\_\_
11. Do you:  Own your home  Rent  Other: \_\_\_\_\_
12. Do you have children?  Yes  No  
If yes, please list their ages: \_\_\_\_\_
13. How many people live in your household? \_\_\_\_\_
14. Please list the occupations of any other adults in your household:  
\_\_\_\_\_
15. What is your highest level of education completed?  
 Some high school  
 High school graduate  
 Some college  
 Associate's degree  
 Bachelor's degree  
 Graduate degree (please specify): \_\_\_\_\_

16. If you attended college, what was your course of study? \_\_\_\_\_

17. What is your current employment status?

Employed full-time  Employed part-time  Self-employed  
 Unemployed  Student  Retired  Homemaker

18. What is your current occupation and employer? (If retired, please state your most recent occupation and employer)

Occupation: \_\_\_\_\_

Employer: \_\_\_\_\_

19. How long have you been in this job/position? \_\_\_\_\_

20. Have you ever served in the military?  Yes  No

If yes, please answer the following:

- i. Branch of service: \_\_\_\_\_
- ii. Years of service: \_\_\_\_\_
- iii. Highest rank achieved: \_\_\_\_\_
- iv. Type of discharge: \_\_\_\_\_

21. Did you ever serve in a military police unit or have any law enforcement duties while in the military?  Yes  No

22. Do you have any close family members who have served or are currently serving in the military?  Yes  No

If yes, please specify their relationship to you and branch of service:

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## **II. Media Exposure and Knowledge of the Case**

### **A. News Consumption**

23. Where do you primarily get your news from? (Check all that apply)

Television  Radio  Newspapers  News websites  
 Social media  Podcasts  Other: \_\_\_\_\_

24. How often do you follow the news?

Multiple times a day  Daily  Several times a week  
 Weekly  Rarely  Never

25. Which of the following news sources do you regularly use? (Check all that apply)

CNN  Fox News  MSNBC  ABC  CBS  NBC  
 New York Times  Wall Street Journal  New York Post  
 Daily News  Newsday  Washington Post  USA Today  
 NPR  Reuters  Associated Press  BBC  
 Other (please specify): \_\_\_\_\_

26. Of the above news sources, which one do you rely on most?

\_\_\_\_\_

27. Which social media platforms do you use regularly? (Check all that apply)

Facebook  Twitter  Instagram  TikTok  LinkedIn  
 YouTube  Reddit  Other: \_\_\_\_\_

What are your names/handles on the platforms you use: \_\_\_\_\_

### **B. Familiarity with the Case**

28. Have you seen, read, or heard anything about this case involving George Santos?

Yes  No  Unsure

29. If yes, where did you hear about it? (Check all that apply)

Television news  Newspaper  Radio  Internet news site  
 Social media  Friends/family  Other: \_\_\_\_\_

30. What do you recall hearing or reading about this case? Please be specific:

\_\_\_\_\_

\_\_\_\_\_

31. Based on what you have heard or read, have you formed any opinion about this case?

Yes  No  Unsure

If yes, what is that opinion? \_\_\_\_\_

\_\_\_\_\_

32. Have you ever posted anything about this case or George Santos on social media?

Yes  No

If yes, please describe the content of your post: \_\_\_\_\_

\_\_\_\_\_

### **C. Knowledge of George Santos**

33. Before this questionnaire, were you familiar with George Santos?

Yes  No  Unsure

34. If yes, what did you know about him? \_\_\_\_\_

\_\_\_\_\_

35. Are you aware of any controversies or allegations involving George Santos?

Yes  No  Unsure

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

36. To your knowledge, do any of your relatives, close friends, associates, or employers personally know the defendant?  
 Yes  No  Unsure

If yes, how do they know the defendant?

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37. Did you or anyone you know vote for George Santos as a candidate for political office?  
 Yes  No  Unsure

38. Did you or anyone you know ever work or volunteer for George Santos' campaign for office?

39. Before today, had you read, seen, or heard anything about the defendant or criminal charges brought against him?  
 Yes  No  Unsure

40. Have you formed any opinions about George Santos based on what you have seen, heard, or read?

Yes  No  Unsure

If yes, what are those opinions?

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41. Do you have any close friends or family members who identify as LGBTQ+?  
 Yes  No  Prefer not to say

42. How would you describe your general attitude towards LGBTQ+ rights?  
 Strongly supportive  Somewhat supportive  
 Neutral  Somewhat opposed  Strongly opposed

#### **D. Exposure to Political News and Commentary**

43. How would you rate your level of interest in current political news and events?  
 Very interested  Somewhat interested  Not very interested  Not at all interested

44. Do you watch or listen to political commentary shows or podcasts?  
 Yes  No  
If yes, which ones? \_\_\_\_\_

45. Have you ever attended a political rally or campaign event?  
 Yes  No  
If yes, for which candidate(s) or party? \_\_\_\_\_

46. Have you ever posted or shared political content on social media?

Yes  No

If yes, how often?

Frequently  Occasionally  Rarely

47. Do you follow any politicians or political commentators on social media?

Yes  No

If yes, please list a few: \_\_\_\_\_

48. Do you believe you can set aside any information you may have heard about this case and decide it solely on the evidence presented in court?

Yes  No  Unsure

Please explain: \_\_\_\_\_

### **III. Political Views and Experiences**

#### **A. Political Affiliation and Activity**

49. How would you describe your political views?

Very conservative  Conservative  Moderate  Liberal  Very liberal  
 Libertarian  Other: \_\_\_\_\_  No political views

50. Are you registered to vote?  Yes  No

If yes, with which party are you registered?

Democratic  Republican  Independent  Other: \_\_\_\_\_

51. How often do you vote in elections?

Always  Usually  Sometimes  Rarely  Never

52. Have you ever made a financial contribution to a political candidate or party?

Yes  No

If yes, approximately what amount(s) and how often? \_\_\_\_\_

53. Have you, or has any relative or close friend, ever worked for or had any interactions with any of the following? (Check all that apply)

U.S. House of Representatives Committee on Ethics  
 New York State Department of Labor  
 National Republican Congressional Committee  
 None of the above

If yes, please describe elaborate:

\_\_\_\_\_

54. Have you ever held or ran for a political office?  Yes  No

If yes, please describe your role: \_\_\_\_\_  
\_\_\_\_\_

55. Have you ever worked or volunteered for a political campaign?  Yes  No  
If yes, please describe your role: \_\_\_\_\_  
\_\_\_\_\_

56. Have you, or has any relative or close friend, ever worked for a federal elected official?  
 Yes  No  Unsure

57. Have you, or has any relative or close friend, ever worked or volunteered on a political campaign for elected office?  
 Yes  No  Unsure

If yes, please describe that work:  
\_\_\_\_\_

58. Do you have any political beliefs that might prevent you from being fair and impartial in this case?  
 Yes  No  Unsure

#### **B. Views on Congress and Politicians**

59. How would you rate your overall opinion of the U.S. Congress?  
 Very favorable  Somewhat favorable  Neutral  
 Somewhat unfavorable  Very unfavorable

60. Do you believe most members of Congress are:  
 Honest and trustworthy  Mostly honest with some exceptions  
 Mostly dishonest with some exceptions  Dishonest and untrustworthy

61. Do you think politicians should be held to a higher ethical standard than the general public?  
 Yes  No  Unsure  
Please explain: \_\_\_\_\_

62. Do you believe that accusations of misconduct against politicians are usually:  
 True and substantiated  Sometimes true, sometimes false  
 Often exaggerated  Usually false or politically motivated

#### **IV. Law Enforcement and Legal System**

63. Have you ever had any direct interactions with law enforcement officers?  
 Yes  No  
If yes, please describe the nature of these interactions: \_\_\_\_\_

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64. How would you rate your overall opinion of law enforcement?

Very positive  Somewhat positive  Neutral  
 Somewhat negative  Very negative

65. Have you ever been a victim of a crime?  Yes  No

If yes, was the crime reported to law enforcement?  Yes  No

Were you satisfied with how law enforcement handled the situation?

Yes  No  Somewhat

Please explain: \_\_\_\_\_

Please describe the circumstances, including the type of crime, when it happened, and the outcome of any law enforcement action:

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66. Do you have any opinion about the enforcement of federal laws that might prevent you from being fair and impartial in this case?

Yes  No  Unsure

67. Regarding law enforcement witnesses, would you be:

More likely to believe their testimony  
 Less likely to believe their testimony  
 Neither more nor less likely to believe their testimony

Please explain your answer:

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68. Do you believe that the crimes charged in the indictment, as described to you, should not be illegal or that such law should not be enforced or prosecuted by the United States government?

Yes  No  Unsure

69. Do you have strong views regarding whether the United States Department of Justice should or should not pursue charges against candidates for elected office?

Yes  No  Unsure

If yes, please describe those views:

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70. Has anyone in your family or close circle of friends ever worked in law enforcement or the legal system?  Yes  No

If yes, please specify their relationship to you and their role: \_\_\_\_\_

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71. Have you or anyone close to you ever been arrested or charged with a crime?

Yes  No

If yes, how did this experience affect your view of the legal system? \_\_\_\_\_

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72. Have you ever sat as a juror or grand juror before in any type of case?

Yes  No

If yes, please provide the following information:

Type of court:  State  Federal

Type of case:  Civil  Criminal

Was a verdict reached?  Yes  No

Please indicate where and when you served, and describe, in general terms, the kind of case(s) you heard:

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73. If you have prior jury experience, is there anything about those experiences that would prevent you from acting as a fair and impartial juror in this case?

Yes  No  Unsure

If yes, please explain:

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74. Have you, or has any relative or close friend, ever worked in law, law enforcement, the justice system, or the courts?

Yes  No  Unsure

If yes, in what capacity?

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Will this influence your ability to render a fair and impartial verdict in this case

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75. Have you had any contact with anyone in law, law enforcement, the justice system or the courts that might influence your ability to render a fair and impartial verdict in this case?

Yes  No  Unsure

If yes, please explain:

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76. Have you developed any bias, prejudice, or other feelings for or against any of the following? (Check all that apply)

United States Department of Justice

- United States Attorney's Office for the Eastern District of New York
- Federal Bureau of Investigation
- Other law enforcement agency
- None of the above

If checked any, please explain:

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77. Do you or any of your relatives or close friends work for a criminal defense lawyer or investigator, or have worked for such a person in the past?

- Yes
- No
- Unsure

78. Do you have any opinions about prosecutors or criminal defense attorneys generally that might make it difficult for you to be a fair and impartial juror in this case?

- Yes
- No
- Unsure

If yes, please explain:

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79. Have you, or has any relative or close friend, ever participated in a state or federal court case, whether criminal or civil, as a witness, plaintiff, or defendant?

- Yes
- No
- Unsure

If yes, what kind of case and what was your role?

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80. Have you, or has any relative or close friend, ever been the subject of any criminal investigation or accusation by any grand jury, state or federal, or any other investigation?

- Yes
- No
- Unsure

81. Have you, or has any relative or close friend – either as an individual or in the course of business – ever been a party to a legal action or dispute with the United States, or with any of its offices, departments, agencies, or employees?

- Yes
- No
- Unsure

82. Have you had any legal, financial, or other interest in any such legal action or dispute or its outcome?

- Yes
- No
- Unsure

83. Have you, or has any relative, ever had a dispute concerning money owed to you by the government or owed by you to the government?

- Yes
- No
- Unsure

**V. Experiences Related to the Allegations in the Indictment**

84. Have you or anyone close to you ever been a victim of financial fraud, identity theft, or other financial deception?

Yes  No

If yes, please describe the experience without providing specific details:

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85. Have you or anyone you know ever applied for unemployment insurance benefits?

Yes  No

If yes, was such application in connection with the COVID-19 Pandemic?

Yes  No

86. How would you rate your knowledge of campaign finance laws?

Very knowledgeable  Somewhat knowledgeable

Not very knowledgeable  No knowledge

87. Are you familiar with the term "FEC" (Federal Election Commission)?

Yes  No

If yes, what do you understand its role to be? \_\_\_\_\_

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88. To the best of your knowledge, are there limits on how much an individual can contribute to a political campaign?  Yes  No  Unsure

If yes, what do you believe these limits to be? \_\_\_\_\_

89. Are you familiar with the concept of "Super PACs"?  Yes  No

If yes, what is your understanding of how they operate? \_\_\_\_\_

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90. Have you, or has any relative or close friend, ever worked for, volunteered for, or contributed funds to a Section 501(c)(4) social welfare organization or an independent expenditure-only committee (also known as a "Super PAC")?

Yes  No  Unsure

If yes, please elaborate:

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91. Do you have any opinions about current campaign finance laws?

Yes  No

If yes, please explain: \_\_\_\_\_

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92. Are you familiar with the process of reporting political contributions?

Yes  No  Somewhat

If yes or somewhat, what is your understanding of this process? \_\_\_\_\_

93. Have you, or has any relative or close friend, had any experiences of any kind, directly or indirectly, with unemployment insurance benefits fraud, credit card fraud, identity theft, or fraud generally?

If yes, please explain:

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94. Have you, or a close relative or friend, ever been accused of or investigated for any type of fraud?

Yes  No

If yes, please explain the circumstances without providing specific details:

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95. In your work or personal life, have you ever been responsible for detecting or preventing fraud?

Yes  No

If yes, please describe your role: \_\_\_\_\_

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## **VI. Ability to Serve**

### **A. Time Commitment and Availability**

96. This trial is expected to last approximately 4-6 weeks. Are you able to serve for this duration?

Yes  No  Unsure

If no or unsure, please explain: \_\_\_\_\_

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97. Do you have any personal commitments that would make it difficult for you to get to court by at least 9:30 a.m. every day of trial, or remain at the courthouse until 5:00 p.m.?

Yes  No  Unsure

If no or unsure, please explain: \_\_\_\_\_

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98. Do you have any pre-planned commitments during the next 6 weeks that cannot be rescheduled? (e.g., medical procedures, important family events, pre-paid travel)

Yes  No

If yes, please describe (without providing specific dates): \_\_\_\_\_

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99. Would serving on this jury create any undue financial hardship for you?

Yes  No

If yes, please explain: \_\_\_\_\_

100. Does your employer pay you for jury duty?

Yes  No  I am not currently employed

If no, would this create a hardship for you?  Yes  No

101. Do you have any caregiving responsibilities that might interfere with your ability to serve?

Yes  No

If yes, please explain: \_\_\_\_\_

## **B. Physical or Mental Health Considerations**

102. Do you have any physical health issues that might affect your ability to serve as a juror? (e.g., difficulty sitting for long periods, hearing problems)

Yes  No

If yes, please explain: \_\_\_\_\_

103. Do you have any mental health issues that might affect your ability to serve as a juror? (e.g., anxiety, difficulty concentrating)

Yes  No

If yes, please explain: \_\_\_\_\_

104. Are you currently taking any medications that might affect your ability to concentrate or stay alert during trial proceedings?

Yes  No

If yes, please explain (without naming specific medications): \_\_\_\_\_

105. Do you have any concerns about your ability to handle the stress of serving on a jury in a high-profile case?

Yes  No

If yes, please explain: \_\_\_\_\_

## **C. Language Proficiency**

106. Is English your first language?

Yes  No

If no, what is your first language? \_\_\_\_\_

107. Do you have any difficulty reading, writing, or understanding English?

Yes  No

If yes, please explain: \_\_\_\_\_

108. Would you feel comfortable deliberating in English with other jurors?  
 Yes  No  Unsure

109. Do you think you would need any language accommodations to serve effectively as a juror?  
 Yes  No  
If yes, what kind of accommodations? \_\_\_\_\_

#### **D. Ability to Follow Legal Instructions**

110. The law requires that jurors must presume the defendant innocent unless the government proves guilt beyond a reasonable doubt. Do you have any hesitation about following this instruction?

Yes  No  
If yes, please explain: \_\_\_\_\_

111. Can you commit to basing your verdict solely on the evidence presented in court and the judge's instructions on the law, rather than on any outside information or personal beliefs?

Yes  No  Unsure  
Please explain: \_\_\_\_\_

112. Would you have any difficulty following a legal instruction from the judge even if you personally disagreed with it?

Yes  No  Unsure  
Please explain: \_\_\_\_\_

113. Do you understand that the burden of proof is on the government and that the defendant is not required to present any evidence or testify?

Yes  No

114. If the defendant chooses not to testify, would you hold that against him in any way?

Yes  No  Unsure  
Please explain: \_\_\_\_\_

115. Can you commit to not discussing the case with anyone, including family and friends, and to avoiding all media coverage of the case during the trial?

Yes  No  Unsure  
If no or unsure, please explain: \_\_\_\_\_

116. Do you have any concerns about your ability to be a fair and impartial juror in this case?

Yes  No  
If yes, please explain: \_\_\_\_\_

117. Is there any other reason, not covered in this questionnaire, that might affect your ability to serve as a fair and impartial juror in this case?

Yes  No

If yes, please explain: \_\_\_\_\_

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## **VII. Juror Rights and Responsibilities**

118. Do you understand that as a juror, you would be:

a) A judge of the facts presented in evidence?

Yes  No

b) Required to apply the law as instructed by the judge, even if you disagree with it?

Yes  No

119. Do you have any concerns about your ability to fulfill the responsibilities of a juror?  Yes  No

If yes, please explain: \_\_\_\_\_

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120. Do you understand that sympathy, bias, and prejudice should not play any part in your deliberations as a juror?  Yes  No

121. Do you understand that the defendant is presumed innocent until proven guilty beyond a reasonable doubt?

Yes  No

122. Do you have any hesitation about applying the presumption of innocence in this case?

Yes  No

If yes, please explain: \_\_\_\_\_

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123. Do you understand that the burden of proof is always on the government and never shifts to the defendant?

Yes  No

124. If, after hearing all the evidence, you had a reasonable doubt about the defendant's guilt, would you be able to find him not guilty?

Yes  No  Unsure

Please explain: \_\_\_\_\_

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125. Do you understand that the Indictment is not evidence of guilt, but merely a formal accusation?

Yes  No

126. Do you understand that the defendant has no obligation to testify or present any evidence in his defense?

Yes  No

127. If the defendant chooses not to testify, would you be able to follow the judge's instruction not to hold that against him in any way?

Yes  No  Unsure

Please explain: \_\_\_\_\_

128. Are you willing to keep an open mind throughout the trial and reserve judgment until you have heard all the evidence and the judge's instructions on the law?

Yes  No  Unsure

Please explain: \_\_\_\_\_

129. Do you accept that a defendant:

a) Need not present any evidence at all?

Yes  No  Unsure

b) Is not required to testify on his own behalf?

Yes  No  Unsure

c) Is presumed innocent unless the government proves an allegation beyond a reasonable doubt?

Yes  No  Unsure

If you answered No or Unsure to any of the above, please explain:

130. Do you have any difficulty accepting that the jury's role is to decide questions of fact, while taking instructions on the law from the Court?

Yes  No  Unsure

If yes, please explain:

\_\_\_\_\_

131. Would you have any hesitation or reservation about following the law as explained by the Court, even if you disagree with the law?

Yes  No  Unsure

If yes, please explain:

\_\_\_\_\_

132. Do you accept that the question of punishment is for the Court alone to decide and must not enter into your deliberations?

Yes  No  Unsure

133. Do you accept that sympathy or empathy must not enter into your deliberations, and that only the evidence presented in court may be used to determine guilt?  
 Yes  No  Unsure

134. If the evidence established a defendant's guilt beyond a reasonable doubt, would you be able to render a guilty verdict?  
 Yes  No  Unsure

If no or unsure, please explain:

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## **VIII. Additional Information**

### **A. Any Other Relevant Information**

135. Is there anything else you believe the Court should know about you that might be relevant to your service as a juror in this case?  
 Yes  No  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

136. Are there any topics or issues not covered in this questionnaire that you think might affect your ability to be a fair and impartial juror in this case?  
 Yes  No  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### **B. Questions or Concerns for the Court**

137. Do you have any questions about jury service or this case that you would like to ask the Court?  
 Yes  No  
If yes, please list your questions: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Certification**

I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge and belief. I understand that if I have intentionally provided false information in this questionnaire, I may be subject to penalties for perjury.

Juror Number: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_